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11 Attorneys for Defendant-Counterclaimant
12 FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

18 | MEDIATEK INC.,

Civil Action No. 4:11-cv-05341 (YGR)

Plaintiff,

FREESCALE'S STIPULATED ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL

20 || v.

21 FREESCALE SEMICONDUCTOR, INC.,

Defendant.

Hon. Yvonne Gonzalez Rogers

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
2 Defendant Freescale Semiconductor, Inc. (Freescale) submits this motion for an order to file
3 under seal the confidential, unredacted versions of the following document:

4 1. Portions of the corrected Freescale's Motion to Exclude Certain Testimony of
5 Catharine M. Lawton (Motion), attached to the Errata for Freescale's Motion.

6

7 Freescale attaches the corrected Motion with the Errata, to replace the current Dkt. No.
8 302-5. The corrected Motion contains confidential information that Freescale has previously
9 sought to file under seal in its Stipulated Administrative Motion to File Under Seal. Dkt. No.
10 302.

11 The highlighted portions of the corrected Motion discuss confidential information about
12 Freescale's internal product development, derived from documents produced by Freescale to
13 MediaTek that had been designated "Highly Confidential – Attorneys' Eyes Only" pursuant to the
14 Stipulated Protective Order, Docket No. 100, in force in this action.

15 The highlighted portions of the corrected Motion discuss confidential information from
16 the acquisition of the '753 patent, derived from MediaTek document MTK-00030681. MediaTek
17 produced MTK-00030681 to Freescale and designated it "Highly Confidential – Attorneys' Eyes
18 Only."

19 Pursuant to Civil Local Rule 79-5(b), Freescale seeks to seal the identified portions of the
20 corrected Motion. The Declaration of Mark Patrick In Support of Freescale Semiconductor,
21 Inc.'s Stipulated Administrative Motion to File Documents Under Seal (Dkt. No. 302-2) and the
22 Declaration of MH Shieh In Support of Freescale's Administrative Motion to File Under Seal
23 (Dkt. No. 310) provide the bases for sealing the corrected Motion. Freescale also files a narrowly
24 tailored proposed sealing order pursuant to Civil Local Rule 79-5(d)(1)(b).

25 Pursuant to Civil Local Rule 79-5(d)(2), Freescale will lodge with the Clerk the
26 documents at issue, with accompanying chamber copies.

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1 Pursuant to Civil Local Rule 7-11 and 7-12, Freescale and MediaTek stipulated to the
2 filing of this Motion on December 5, 2013. A signed stipulation is attached. See Joint
3 Stipulation to Freescale's Administrative Motion to File Documents Under Seal.

4 For the foregoing reasons, Freescale requests that the Court enter the accompanying
5 Proposed Order granting Freescale's Stipulated Administrative Motion to File Documents Under
6 Seal and designate the service copies of these documents as "HIGHLY CONFIDENTIAL –
7 ATTORNEYS' EYES ONLY."

8
9 Dated: December 6, 2013

MORRISON & FOERSTER LLP

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